

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

EDWARD J. KOELLER, individually and)	
on behalf of all others similarly situated,)	
)	
<i>Plaintiff,</i>)	
v.)	Case No.: 4:21-cv-540-HEA
)	
RISK BASED SECURITY, INC.,)	
)	
<i>Defendant.</i>)	

STIPULATION OF DISMISSAL

The plaintiff files this Stipulation of Dismissal with prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) with each party to bear his or its own costs. The alleged claims of all other putative class members are dismissed without prejudice.

The parties request the Court to retain jurisdiction to enforce the terms of their settlement agreement under the authority of Kokkonen v. Guardian Life Ins. Co. of America, 511 U.S. 375, 381-82 (1994).

Dated: December 1, 2021

PLAINTIFF,

By:

/s/ Anthony I. Paronich
Anthony I. Paronich, *Pro Hac Vice*
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(508) 221-1510
anthony@paronichlaw.com

DEFENDANT,

By:

/s/ Mary Ann L. Wymore
Mary Ann L. Wymore, MO #44061
GREENSFELDER, HEMKER & GALE, P.C.
mlw@greensfelder.com
10 South Broadway, Suite 2000
St. Louis, Missouri 63102
Tel: 314-241-9090/Fax: 314-241-8624

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system.

/s/ Anthony I. Paronich
Anthony I. Paronich